

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 7
<i>The Worth Collection, Ltd.,</i>)	
)	Case No. 20-10337 (BLS)
Debtor.)	
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DOUGLAS T. TABACHNIK, in his)	
capacity as the chapter 7 trustee of the)	
bankruptcy estate of The Worth Collection,)	
Ltd.,)	Adv. Proc. No. _____
)	
Plaintiff,)	
)	
v.)	
)	
JAY ROSENBERG; DAVID D. DEFEO;)	
SETH GROSSMAN; BRIAN MCGEE;)	
JASON NEIMARK; JOHN DISA;)	
FRANCINE DELLA BADIA; MICHAEL)	
GILSON; ART LORENZ; KELLY)	
COLLINS; JOSEPHINE AMISTOSO;)	
SUSAN GUSTAFSON; and JOHN DOES)	
1-10; DOE CORPORATIONS 1-10; DOE)	
LIMITED PARTNERSHIPS 1-10; DOE)	
LIMITED LIABILITY COMPANIES 1-10)	
)	
Defendants.)	
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COMPLAINT

CONFIDENTIAL - FILED UNDER SEAL

Dated: March 24, 2023
Wilmington, Delaware

GOLDSTEIN & MCCLINTOCK LLP

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-and-

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